



Respectfully submitted,

JACKSON WALKER LLP

By: /s/ Charles L. Babcock

Charles L. Babcock

Texas State Bar No. 01479500

cbabcock@jw.com

Joel R. Glover

Texas State Bar No. 24087593

jglover@jw.com

Javier Gonzalez

Texas State Bar No. 24119697

jgonzalez@jw.com

1401 McKinney Street, Suite 1900

Houston, Texas 77010

(713) 752-4200 – Phone

(713) 752-4221 – Fax

Matt Dow

Texas State Bar No. 06066500

mdow@jw.com

Adam W. Aston

Texas State Bar No. 24045423

aaston@jw.com

100 Congress Ave., Suite 1100

Austin, Texas 78701

(512) 236-2056 – Phone

(512) 691-4456 – Fax

ATTORNEYS FOR DEFENDANTS

**CERTIFICATE OF SERVICE**

I hereby certify that on April 17, 2023, I caused a copy of the foregoing pleading to be served upon counsel of record for all parties in compliance with the Federal Rules of Civil Procedure.

/s/ Charles L. Babcock

Charles L. Babcock

**OBJECTIONS AND RESPONSES TO  
PLAINTIFF'S DEPOSITION ON WRITTEN QUESTIONS**

**DEPOSITION QUESTION NO. 1.** During the time period from June 30, 2022, through September 1, 2022, did Jay Hartzell ever communicate with you concerning anything Richard Lowery said during his appearance on the Richard Hanania (CSPI) podcast?

**ANSWER:** No.

**DEPOSITION QUESTION NO. 2.** During the time period from June 30, 2022 through September 1, 2022, did Jay Hartzell ever communicate with you concerning anything that Richard Lowery wrote in any online medium?

**ANSWER:** No.

**DEPOSITION QUESTION NO. 3.** If you answered yes to either of the preceding questions, please identify when you communicated with Jay Hartzell.

**ANSWER:** Not applicable.

**DEPOSITION QUESTION NO. 4.** Please describe in detail the contents of any communications with Jay Hartzell referenced in response to the preceding questions.

**ANSWER:** Not applicable.

**DEPOSITION QUESTION NO. 5.** During the time period from June 30, 2022, through September 1, 2022, did anyone other than Jay Hartzell communicate with you concerning anything Richard Lowery said during his appearance on the Richard Hanania (CSPI) podcast?

**ANSWER:** No.

**DEPOSITION QUESTION NO. 6.** During the time period from June 30, 2022, through September 1, 2022, did anyone other than Jay Hartzell communicate with you concerning anything that Richard Lowery wrote in any online medium?

**ANSWER:** Yes.

**DEPOSITION QUESTION NO. 7.** If you answered yes to either of the preceding two questions, please identify all persons who communicated with you concerning what Richard Lowery said or wrote.

**ANSWER:** Meeta Kothare and Laura Starks.

**DEPOSITION QUESTION NO. 8.** Please describe in detail the contents of any communications with any of the individuals identified in response to the preceding question.

**ANSWER:** On August 22, 2022, I was the sender or recipient in a chain of several emails with Meeta Kothare and Laura Starks. The contents of such communications are reflected in Exhibit O of Plaintiff's Motion for Preliminary Injunction.

**DEPOSITION QUESTION NO. 9.** During the time period from June 30, 2022 through November 1, 2022, did you ever exchange text messages with Jay Hartzell concerning Richard Lowery?

**ANSWER:** No.

**DEPOSITION QUESTION NO. 10.** If you had any communications with Meeta Kothare concerning Richard Lowery during the month of August 2022, please describe the contents of all of those communications in detail.

**ANSWER:** See Response to Deposition Question 8. The only communication I had with Meeta Kothare concerning Richard Lowery during the month of August 2022 is reflected in the email chain attached as Exhibit O of Plaintiff's Motion for Preliminary Injunction.

**DECLARATION OF DEFENDANT SHERIDAN TITMAN**

I, Sheridan Titman, declare and state as follows:

My name is Sheridan Titman. I am a defendant in this lawsuit. My answers to Plaintiff Richard Lowery's Deposition on Written Questions are within my personal knowledge and are true and correct.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on April 17, 2023.



---

Sheridan Titman